

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

In Re:

Demeco D. Martin
xxx-xx-2668
Debtor,

Case No.: **18-83393-CRJ-13**
Chapter **13**

Adversary Proceeding
No.:

Demeco D. Martin
Plaintiff,
vs.

Reliant Capital Solutions
Defendant.

COMPLAINT SEEKING RELEASE OF WAGE LEVY PURSUANT TO
11 U.S.C. SECTION 362

COMES NOW the Debtor, by and through his attorney and moves this Honorable Court to release the Wage Levy now pending on the Debtor's income and for grounds therefore, set out as follows:

1. Debtor filed a Chapter 13 Petition and relief was ordered on November 13, 2018.
2. The following creditor filed a wage levy:

Reliant Capital Solutions
c/o US Department of Education
National Payment Center
PO Box 105081
Atlanta, GA 30348-5081

The Debtor's social security number is: **xxx-xx-2668**.

3. The Debtor's payroll information is:
G4S Secure Solutions
1395 University Blvd.
Jupiter, FL 33458

4. The Debtor claimed all future property as exempt.
5. The Debtor represents that the creditor's debt is not for alimony or child support obligation.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this court:

- a. Order Defendant to forthwith release the wage levy to the Debtor;
- b. Order such other relief as it just and proper.

Respectfully submitted,
BOND, BOTES, SYKSTUS,
TANNER & EZZELL, P.C.

/s/ Amy K. Tanner

Ronald C. Sykstus
Amy K. Tanner
James W. Ezzell, Jr.
Kathryn V. Davis
Attorney for Debtor

OF COUNSEL:

BOND, BOTES, SYKSTUS, TANNER & EZZELL, P.C.
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Huntsville, Alabama 35801
(256) 539-9899

CERTIFICATE OF SERVICE

I hereby certify that I have on this 14th day of November, 2018, served a copy of the foregoing Complaint on **Reliant Capital Solutions, c/o US Department of Education, National Payment Center, PO Box 105081, Atlanta, GA 30348-5081, G4S Secure Solutions, 1395 University Blvd., Jupiter, FL 33458, Internal Revenue Service, Centralized Insolvency Ops, PO Box 7346, Philadelphia, PA 19101-7346, Internal Revenue Service, 801 Tom Martin Drive, Stop 126, Birmingham, AL 35211, Internal Revenue Service, c/o Richard E. O'Neal, Assistant U.S. Attorney, Robert S. Vance Federal Building, Room 200, 1800 5th Avenue North, Birmingham, Alabama 35203, Internal Revenue Service, c/o Matthew G. Whitaker, Attorney General, U.S. Department of Justice, Tax Division, 950 Pennsylvania Avenue NW, Washington, D.C. 20530-0001, Internal Revenue Service, PO Box 21126, Philadelphia, PA 19114, Internal Revenue Service, PO Box 7346, Philadelphia, PA 19101-7346, and Michele T. Hatcher, Chapter 13 Trustee**, by mailing the same by United States mail properly addressed and First Class Postage prepaid.

/s/ Amy K. Tanner
OF COUNSEL